

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

## **UNITED STATES' RESPONSE TO DEFENDANTS' PROPOSED EXHIBITS**

COMES NOW the United States of America, by and through Louis V. Franklin, Sr., Acting United States Attorney for the Middle District of Alabama, and Andrew C. Lourie, Acting Chief of the Public Integrity Section of the Criminal Division of the United States Department of Justice, and hereby files its Response to Defendants' Proposed Exhibits. The United States reserves objection to the admissibility of any proposed exhibit until it is offered at trial. See Fed. R. Evid. 104, Advisory Committee Notes ("The applicability of a particular rule of evidence often depends upon the existence of a condition. . . . [T]he admissibility of evidence will turn upon the answer to the question of the existence of the condition. "). See, e.g., Fed. R. Evid. 402 (relevancy), 802 (hearsay).

Respectfully submitted this 18th day of April, 2006.

LOUIS V. FRANKLIN, SR.  
ACTING UNITED STATES ATTORNEY

/s/ Louis V. Franklin, Sr.  
Acting United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104  
Phone: (334)223-7280  
Fax: (334)223-7560  
Email: louis.franklin@usdoj.gov

/s/ J.B. Perrine  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104  
Phone: (334)223-7280  
Fax: (334)223-7135  
Email: [jb.perrine@usdoj.gov](mailto:jb.perrine@usdoj.gov)  
ASB-9077-E31J

/s/ Jennifer Garrett  
Special Assistant United States Attorney  
Assistant Attorney General  
Office the Attorney General  
11 S. Union  
Montgomery, AL 36130  
Phone: (334)353-8494  
Fax: (334)242-4890  
Email: [jgarrett@ago.state.al.us](mailto:jgarrett@ago.state.al.us)  
ASB-4600-T77J

/s/ Stephen P. Feaga  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104  
Phone: (334)223-7280  
Fax: (334)223-7560  
Email: steve.feaga@usdoj.gov  
ASB-7374A60S

ANDREW C. LOURIE  
ACTING CHIEF, PUBLIC INTEGRITY  
SECTION

/s/Richard C. Pilger  
Department of Justice, Criminal Division  
Public Integrity Section  
10<sup>th</sup> & Constitution Ave, NW  
Bond Building - 12<sup>th</sup> Floor  
Washington, DC 20530  
Phone: (202)514-1412  
Fax: (202)514-3003  
Email: richard.pilger@usdoj.gov

/s/ Joseph L. Fitzpatrick, Jr. Special Assistant  
United States Attorney  
Assistant Attorney General  
Office of the Attorney General  
11 S. Union  
Montgomery, AL 36130  
Phone: (334)353-4839  
Fax: (334)242-4890  
Email: [j.fitzpatrick@ago.al.state.us](mailto:j.fitzpatrick@ago.al.state.us)

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA** )  
 )  
 )  
 )  
**v.** )  
 )  
 )  
 )  
**DON EUGENE SIEGELMAN,** )  
**PAUL MICHAEL HAMRICK,** )  
**GARY MACK ROBERTS, and** )  
**RICHARD M. SCRUSHY** )  
 )  
CR. NO. 2:05-CR-119-MEF

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

LOUIS V. FRANKLIN, SR.  
ACTING UNITED STATES ATTORNEY

/s/ James B. Perrine  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104  
Phone: (334)223-7280  
Fax: (334)223-7560  
Email: steve.feaga@usdoj.gov  
ASB